UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 10 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL # 7009 1680 0000 7677 7957
RETURN RECEIPT REQUESTED

Mr. Dave Toni
Owner and Vice President
Belmont Plating Works, Incorporated
3410 North River Road
Franklin Park, Illinois 60131

Re: Notice of Violation
Compliance Evaluation Inspection
ILD005114665

Dear Mr. Toni:

On April 29, and July 22 and 23, 2014 representatives of the U.S. Environmental Protection Agency and other agencies, as part of a multimedia team, inspected the Belmont Plating Works, Incorporated's facility located in Franklin Park, Illinois (Belmont Plating). We thank you and your employees for everyone's cooperation and assistance during the inspection.

This letter addresses the RCRA portion of the inspection. As a large quantity generator of hazardous waste, Belmont Plating is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the RCRA portion of the multimedia inspection was to evaluate Belmont Plating's compliance with certain provisions of RCRA and its implementing regulations. A copy of the RCRA portion of the inspection report and its addendum is enclosed for your reference.

Based on information provided by Belmont Plating, EPA's review of records pertaining to Belmont Plating, and the inspector's observations, EPA has determined that Belmont Plating has stored hazardous waste without a permit or interim status as a result of Belmont Plating's failure to comply with a certain condition for a permit exemption under Il. Admin. Code tit. 35 I.A.C. § 722.134(a)-(c) [40 C.F.R. § 262.34(a)-(c)]. At the time of the inspection, Belmont Plating was out of compliance with the following large quantity generator permit exemption condition:

> A large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(a) [40 C.F.R. §§ 262.34(a)(4) and 265.16(a)].

Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, and must take part in an annual review of this initial training thereafter. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(b) and (c) [40 C.F.R. §§ 262.34(a)(4) and 265.16(b) and (c)]. With respect to this training program, a large quantity generator must maintain documents and records at its facility that document that the training or job experience described above has been given to and completed by facility personnel. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(d) [40 C.F.R. §§ 262.34(a)(4) and 265.16(d)].

At the time of the inspection, Belmont Plating was unable to provide the requested documents and records for all personnel responsible for hazardous waste management during the previous three years, including the names of employees responsible for hazardous waste management, the date of hire or initial assignment, the date of initial training, and the date for all subsequent annual training completed by the employee.

By failing to comply with the condition for a permit exemption, above, Belmont Plating became an operator of a hazardous waste storage facility, and was required to obtain an Illinois hazardous waste storage permit. Belmont Plating failed to apply for such a permit. Belmont Plating's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ill. Admin. Code tit. 35 §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725 is also an independent violation of the corresponding TSD requirement.

At this time, EPA is not requiring Belmont Plating to apply for an Illinois hazardous waste storage permit so long as it immediately establishes compliance with the condition for a permit exemption outlined above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above condition. You should submit your response to Daniel Chachakis, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Daniel Chachakis, of my staff, at (312) 886-9871 or at chachakis.daniel@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois EPA; todd.marvel@illinois.gov

U. S. Environmental Protection Agency
Region 5, Land and Chemicals Division
RCRA Branch
77 West Jackson Boulevard
Chicago, Illinois 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME:	Belmont Plating Works Incorporated
EPA ID NUMBER:	ILD005114665
ADDRESS:	3410 North River Road Franklin Park, Illinois 60131
DATE OF INSPECTION:	April 29, 2014
EPA INSPECTOR:	Daniel F. Chachakis Environmental Protection Specialist (EPS)

PREPARED BY:

Daniel F. Chachakis, EPS — Date: 06/09/2014
Compliance Section 1

ACCEPTED BY:

Michael Cunningham, Chief — Date: 6/9/14
Compliance Section 1

Purpose of Inspection: This inspection was an evaluation of Belmont Plating Works, Incorporated's compliance with hazardous waste regulations found at Illinois Title 35 and the Code of Federal Regulations (CFR). The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) conducted as part of a multimedia CEI. The site notified as a large quantity generator (LQG).

Participants

Inspector:

Daniel Chachakis, RCRA Inspector, EPA

Site Representative(s):

Bob Bethel, Plant Manager, Belmont Plating Works
Roy Newman, Office Manager, Belmont Plating Works
Dave Toni, owner and Vice President, Belmont Plating Works
Joanne Kiepura, CEF, Consultant, Scientific Control Laboratories, Inc.

Introduction: On April 29, 2014, I arrived at the site at approximately 8:40 am. I introduced myself, presented my inspector credentials to the secretary manning the doorway, and was escorted to a conference room by Mr. Newman. Mr. Newman then left to call the consultant, Ms. Kiepura. When Mr. Newman returned we discussed the situation on the phone with Ms. Kiepura, and developed an inspection plan. Mr. Newman left to get Mr. Bethel, and when they returned I began the opening conference. I presented my credentials again to Mr. Newman and Mr. Bethel, exchanged business cards, and described the purpose and process by which I intended to conduct the inspection. Mr. Bethel provided me with a description of the site operations and led the tour. Ms. Kiepura, who joined Mr. Bethel and I during the walk through, provided me with the records I requested for review.

I provided a Small Business Resources information sheet and the Illinois Sustainable Solutions brochure to Mr. Bethel. We discussed for the site tour the following safety equipment was recommended or required: steel-toed boots and hearing protection.

I informed Mr. Bethel and Mr. Newman, and later Mr. Toni, that Belmont Plating Works could claim any information gathered during the inspection as Confidential Business information including: verbal information, documents and photographs. Mr. Newman and Mr. Bethel did not make a CBI claim on the information gathered during the inspection. However, Mr. Bethel did state that pictures of specific parts may be CBI. Later at the closing conference, Mr. Toni and I discussed CBI, and Mr. Toni did not make a CBI claim. The closing included a review by Mr. Toni of the pictures I took to document this CEI.

Site Description: Mr. Bethel provided a site description. He stated that onsite processes include: copper, nickel, chromium, cadmium, zinc, chloride (rack and barrel processing), Black oxide, tin (bright and dull, barrel and rack), and stainless steel passivating.

The site generates F006/F007 hazardous waste, used oil and universal waste lamps. The site accumulates its hazardous waste in a roll off container.

This site has pretreatment discharge permit allowing for a wastewater flow through system that consists of two sumps with pumps, tanks for cyanide destruction and pH adjustment, and a sludge press that and generates F006 hazardous waste sludge. Mr. Bethel stated that the pH of the wastewater that moves through the system to the tanks prior to treatment is from 7 to 10.

There are no hazardous waste storage tanks onsite.

Building 1 has been in use since 1955, and the others added over the years. There are approximately 80 workers at the site operating in two shifts.

Site Tour: Mr. Bethel led the tour. I observed facility operations including: the less-than 90-day accumulation roll-off, solid waste areas, product storage areas, used oil storage, and emergency equipment. I took photographs of the various facility operations, waste operations, and waste storage/accumulation areas during the site tour. I observed, and took a picture of, the facility sign (Picture 1)

Picture #: 1
Date: April 29, 2014
Photographer: Dan Chachakis
Location: Belmont Plating
Subject: Sign

We entered Building 1, and went to the laboratory / quality control area. I observed, and took a picture of, the work area (Picture 2).

Picture #: 2
Date: April 29, 2014
Photographer: Dan Chachakis
Location: Belmont Plating, Building 1
Subject: QC Laboratory

I asked about the sinks in the laboratory area. Mr. Bethel stated the sinks are tied into the wastewater treatment system.

We moved to the plating lines. I observed, and took a picture of, a yellow/green colored material in a trough around Machine 403 at the Chloride / Zinc plating line (Picture 3).

Picture #: 3
Date: April 29, 2014
Photographer: Dan Chachakis
Location: Belmont Plating, Building 1
Subject: Machine 403

Mr. Bethel stated the yellow/green material in Picture 3 was wax. He stated that the wax is applied on parts plated by Belmont Plating Works to protect the machines belonging to the customers as they use the parts in their respective production processes.

I observed, and took a picture of, a used oil storage area. I counted 40 containers of used oil in this area. Mr. Bethel stated that the used oil is a result of parts cleaning prior to plating.

Picture #: 4
Date: April 29, 2014
Photographer: Dan Chachakis
Location: Belmont Plating, Building 1
Subject: Used oil container storage

Brightness: +20%

I observed, and took a picture of, containers lined in a row (Picture 5). Mr. Bethel stated that the container held raw materials for the production lines, and that the materials are used every day.

Picture #: 5
Date: April 29, 2014
Photographer: Dan Chachakis
Location: Belmont Plating, Building 1
Subject: Raw material storage

We moved to the other side of Machine 403. I observed, and took a picture of, one of the plating lines (Picture 6). The line is "U" shaped, with parts cleaning occurring on the left side, and plating occurring on the right. From the plating tanks, I recorded the words, "Yellow Chrome," and, "Clear Chromate Trivalent."

Picture #: 6
Date: April 29, 2014
Photographer: Dan Chachakis
Location: Belmont Plating, Building 1
Subject: Plating Line

Brightness: +15%

I observed the presence of a loading dock. Mr. Bethel stated that workers receive materials from a warehouse for plating at the loading dock.

We moved to Building 2. I observed, and took a picture of, a small spill of yellow material (Picture 7). Mr. Bethel stated the material was from Machine 402, and the material was water and wax sealer.

Picture #: 7
Date: April 29, 2014
Photographer: Dan Chachakis
Location: Belmont Plating, Building 2
Subject: Material near machine 402.

I observed and diagramed tanks of the wastewater treatment system (Diagram 1).

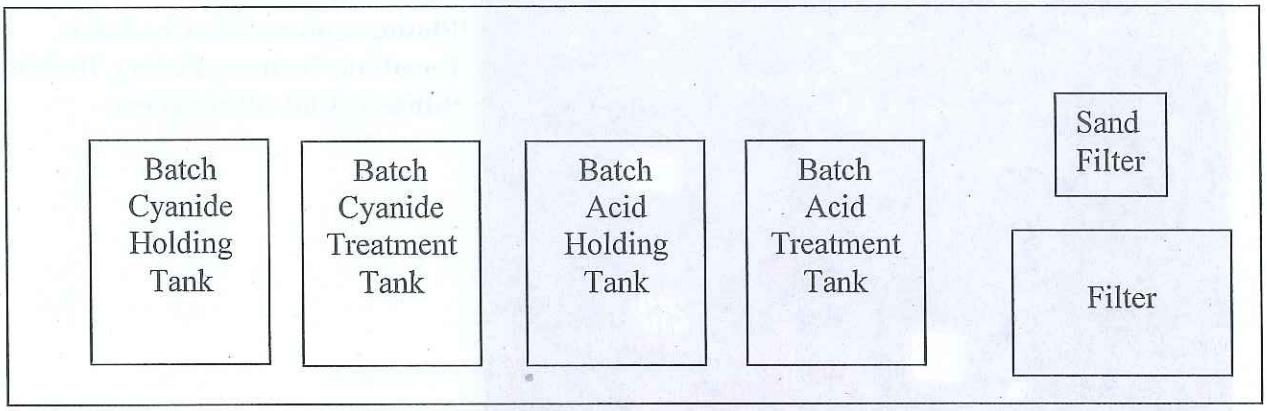


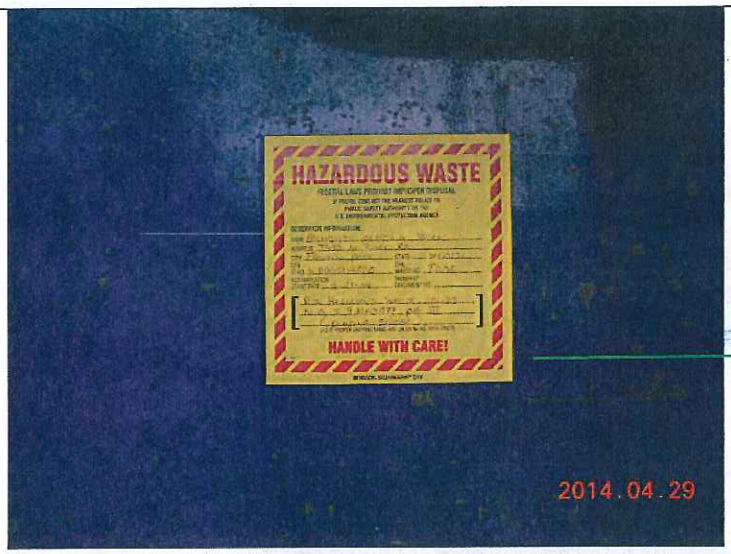
Diagram 1

At this point in the tour we were joined by Ms. Kiepura. I observed, and took a picture of, the filter press at the end of the wastewater treatment system (Picture 8).

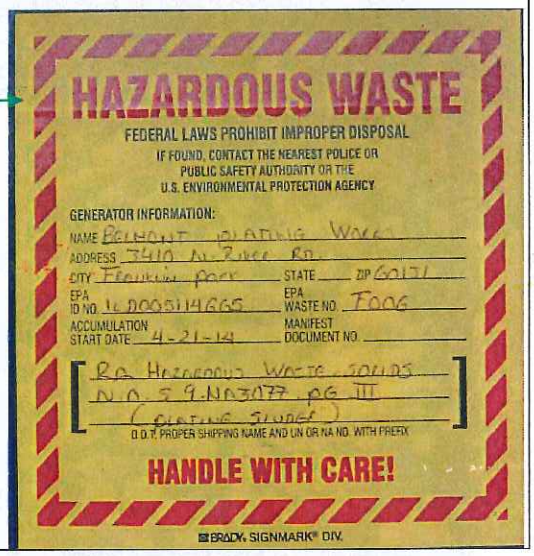
Picture #: 8
Date: April 29, 2014
Photographer: Dan Chachakis
Location: Belmont Plating, Building 2
Subject: Sludge press and containers

I observed, and took a picture of, a roll off container (Picture 9) and its hazardous waste label (Picture 10).

Picture #: 9
Date: April 29, 2014
Photographer: Dan Chachakis
Location: Belmont Plating, Building 2
Subject: Roll-off container.



Picture #: 10
Date: April 29, 2014
Photographer: Dan Chachakis
Location: Belmont Plating, Building 2
Subject: Hazardous Waste label on Roll-off container from Picture 9.

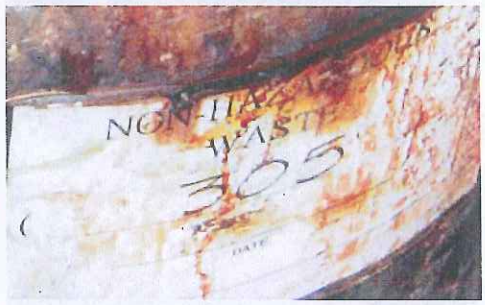


I lifted the cover and looked inside the roll-off container in Picture 9. I observed that the container was near full. Mr. Bethel stated there was a shipment schedule for April 30th (the next day).

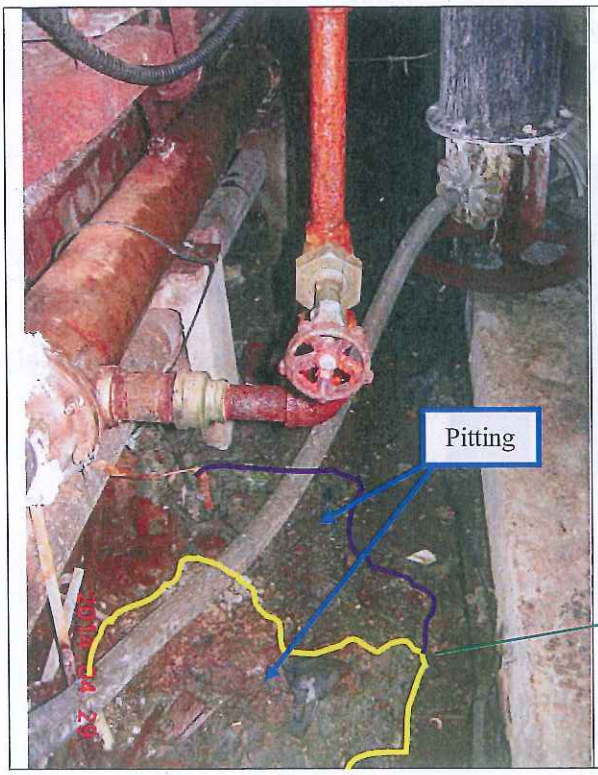
We entered Building 1.

I observed, and took a picture of, what Mr. Bethel described as a rinse container with a non-hazardous waste label marked with the number, "305" (Picture 11). Mr. Bethel stated the container was a rinse container, and when the rinse gets saturated the material is poured into the wastewater treatment system.

Picture #: 11
Date: April 29, 2014
Photographer: Dan Chachakis
Location: Belmont Plating, Building 1
Subject: Rinse container

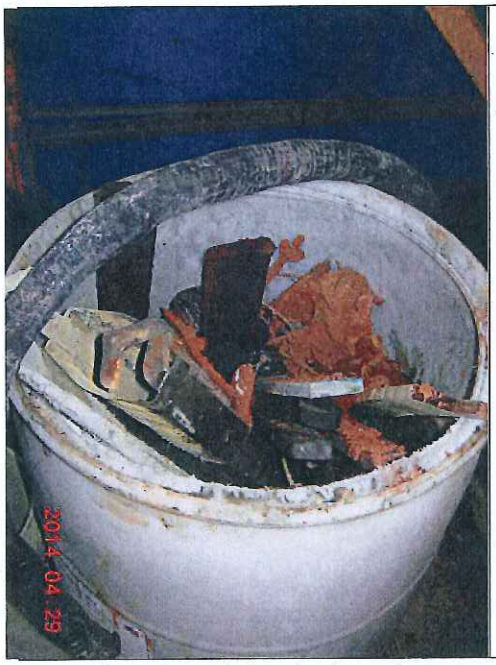


We walked through and around the cadmium and nickel plating lines. I observed, and took a picture of, material in the area between the lines (Picture 12). I noted the pitting in the concrete and potential solid waste under the plating tanks.



Picture #: 12
Date: April 29, 2014
Photographer: Dan Chachakis
Location: Belmont Plating, Building 1
Subject: Trough and under plating line

I observed, and took a picture of, a container with materials in the container (Picture 13; the container was not marked or labeled with its contents.



Picture #: 13
Date: April 29, 2014
Photographer: Dan Chachakis
Location: Belmont Plating, Building 1
Subject: Container with material

Mr. Bethel stated the material in the container (Picture 13) is from the cleanout of the area in and around the area in Picture 12, and is most likely not a hazardous waste.

I observed, and took a picture of, sludge accumulation (Picture 14). I noted that this accumulation was typical under the process tanks. I recorded that the container was not labeled with the contents of the container.

Picture #: 14
Date: April 29, 2014
Photographer: Dan Chachakis
Location: Belmont Plating, Building 1
Subject: Container with material

We walked in and round an area with copper, nickel and chrome plating tanks.

I observed, and took a picture of, the area between cleaning tanks (Picture 15). I noted the material in the gaps of the walkway.

Picture #: 15
Date: April 29, 2014
Photographer: Dan Chachakis
Location: Belmont Plating, Building 1
Subject: Cleaning tank area walkway

We walked in and around the nickel line.

I observed, and took a picture of, a pump and sump (Picture 16). Mr. Bethel stated that the sump collects cyanide containing wastewater, and pumps the wastewater to the wastewater treatment system.

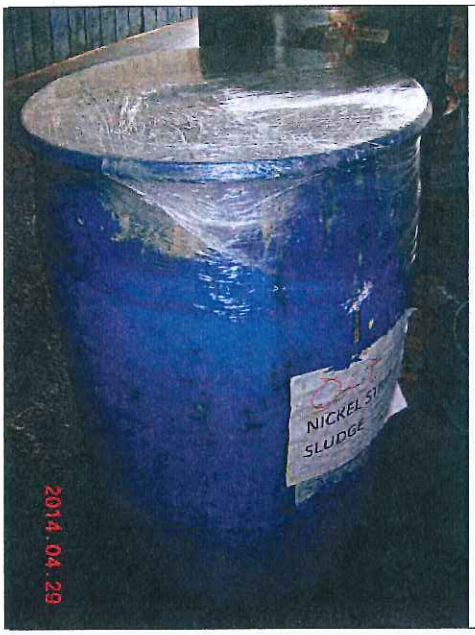
Picture #: 16
Date: April 29, 2014
Photographer: Dan Chachakis
Location: Belmont Plating, Building 1
Subject: Cyanide pump and sump

I observed, and took a picture of, a second pump and sump (Picture 17). Mr. Bethel stated that the sump collects wastewaters from the rest of the areas in the facility (excluding the line using cyanide), and pumps the wastewater to the wastewater treatment system.

Picture #: 17
Date: April 29, 2014
Photographer: Dan Chachakis
Location: Belmont Plating, Building 1
Subject: Second pump and sump

I observed the presence of incorrect labels on production tanks, although the tanks were marked with the names of the chemicals in the tanks.

I observed, and took a picture of, and container marked with the words, "Strip Nickel Sludge" (Picture 18). I noted the cellophane covering on the container.



Picture #: 18
Date: April 29, 2014
Photographer: Dan Chachakis
Location: Belmont Plating, Building 1
Subject: Container – Nickel Strip Sludge

We left the building and walked the perimeter of the facility.

We returned to the conference room at 3410 North River Road.

Records Review: I reviewed waste profiles/characterizations, waste analysis records, manifests, annual reports, and the contingency plan. I completed a LQG checklist(s) during the records review (*See* Appendix A).

Waste Analyses:

- I asked about the wastewater treatment system filter sand. Mr. Bethel stated the sand, when no longer usable, is added to the hazardous waste roll-off container.

- I asked about the filters used in the wastewater treatment system. Mr. Bethel stated the filters, when no longer usable, are added to the hazardous waste roll-off container. He stated that the filters are in use for a year or longer prior to disposal.
- I reviewed the analysis for the filter cake sludge and recorded the following:

    - Determination Date: 01/28/2008
    - Code: F006
    - Nickel < 1%
    - Copper < 1%
    - Chrome < 1%
    - Cadmium < 1%
    - Zinc < 1%

Contingency Plan: I noted the following from the contingency plan and the file associated with the plan -

- Named the Chemical Safety Contingency Plan
- Letters are present documenting submission to safety and emergency response organizations
- Current Revision: 12/21/2009
- The facility has a PA system and personnel are issued radios for communication
- The plan address fires, spills, and explosions.

Manifests: I recorded the following information from the manifests -

- Manifests from 2012 through the CEI date were available for inspection.
- TSDF: Envirite of Illinois, Harvey, Illinois, ILD000666206.
- Transporter: Same
- Signatures from Company: Robert Bethel, Javier De Jesus, and Luis Perez
- I specifically reviewed:

Manifest #	Generator Date	TSDF Date
012876848JJK	04/21/2014	Not returned (within window)
012876612JJK	04/10/2014	04/10/2014
012876435JJK	04/02/2014	04/02/2014
012876356JJK	03/27/2014	03/27/2014
012876175JJK	03/19/2014	03/19/2014
012876080JJK	03/11/2014	03/11/2014
012040367JJK	03/03/2014	03/03/2014
012040255JJK	02/21/2014	02/21/2014
012040017JJK	02/11/2014	02/11/2014
012039856JJK	01/31/2014	01/31/2014
012039638JJK	01/21/2014	01/21/2014
012038961JJK	01/08/2014	01/08/2014

Training Program: I recorded the following information from the training program records -

Name	Position	2013	2012	2011	2010	2009	2008
Robert Bethel	Plant Manager	Yes	Yes	Missing	Missing	Yes	Yes
Javier De Jesus	Wastewater Treatment Operator	Missing	Yes	Missing	Missing	NA	Yes
Mark Toni	President	Yes	Missing	Missing	Missing	Yes	Missing
Dave Toni	Vice President	Yes	Missing	Missing	Missing	Yes	Missing
Michael Hohe	Wastewater Treatment Operator	NA	NA	NA	NA	Missing	NA

- Javier De Jesus did not work with hazardous waste in 2009
- Michael Hohe only worked with hazardous waste in 2009

Annual Reports: I recorded that three years of annual reports were available for inspection, including the report for 2013. I recorded the following from the reports:

- NAICS code: 332813
- Owner / operator start date: 01/01/1960
- F006 and F007: 780 cubic yards in 2013, 5.93 lb/gal density
- F006 and F007: 660 cubic yards in 2012

I held a closing conference with the consultant, Joanne Kiepura, and discussed the following: materials under the lines and the condition of the floor, training records, labeling, management of sludge prior to being placed in the wastewater treatment system, and management program responsibilities.

Closing Conference: I held a closing conference with Dave Toni, one of two owners of Belmont Plating. I summarized the maintenance, training, labeling, sludge management, and management responsibility issues identified during the inspection. We discussed figuring out the thickness of the facility floor under the plating lines. We also discussed the possibility of using the treated wastewater onsite and finding a metal recycler for the sludge. I again mentioned that Belmont could make claims of CBI on the material copied, photographs, and information gathered during the inspection, and we reviewed the photographs. Mr. Toni did not make any CBI claims. The inspection concluded at approximately 2:30 pm.

Post-Inspection: Prior to completion of this inspection report, Ms. Kiepura provided me with a layout of the facility and additional training records, as a supplement to the inspection. These documents are located in Appendix B.

Attachments

A. Checklist
B. Post Inspection Documents

ATTACHMENT A
Checklist

Belmont Plating Works, Inc. 04/29/2014

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.)	
	SUBPART A: GENERAL	
722.111	**Section 722.111 Hazardous Waste Determination** Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes X No____ N/A____	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes X No____ N/A____	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes X No____ N/A____	808.121(a)
	Section 722.112 USEPA Identification Numbers	
722.112(a)	Has the generator obtained a USEPA identification number? Yes X No____ N/A____	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes X No____ N/A____	722.112(c)
	SUBPART B: THE MANIFEST	
	Section 722.120 General Requirements	
722.120(a)	Does the facility manifest its waste off-site? Yes X No____ N/A____	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes X No____ N/A____	722.120(a)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes____ No____ N/A X	722.120(b)
	Section 722.121 Acquisition of Manifests	722.120(d)
	Has the generator used:	
722.121(a)	- an ~~Illinois~~ Uniform manifest for wastes designated to a facility within Illinois? Yes X No____ N/A____	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes____ No____ N/A X	
	- an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes____ No____ N/A X	722.121(b)
	Section 722.122 Number of Copies	
722.122	Does the manifest consist of at least 6 copies? Yes X No____ N/A____	722.122
	Section 722.123 Use of the Manifest	
722.123(a)	For each manifest reviewed, has the generator: - signed the certificate by hand? Yes X No____ N/A____	
	- obtained the handwritten signature and the date of acceptance by the initial transporter? Yes X No____ N/A____	722.123(a)
	- retained one copy as required by Section 722.140(a)? Yes X No____ N/A____	
	- apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes X No____ N/A____	
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes X No____ N/A____	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes____ No____ N/A X	722.123(c)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PRE-TRANSPORT REQUIREMENTS	
722.130	Is there any hazardous waste ready for transport off-site? Yes_____ No_____ N/A X If so, is the generator complying with the pre-transport requirements in Subpart C? Yes_____ No_____ N/A X	722.130
	Section 722.134 Accumulation Time	
(722.134(a))	Has the generator complied with the following requirements: Yes_____ No_____ N/A_____	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? Yes X No_____ N/A_____ and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes_____ No_____ N/A X and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes_____ No_____ N/A X and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes_____ No_____ N/A X	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes X No_____ N/A_____	
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes X No_____ N/A_____	
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes X No_____ N/A_____	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:	
	Does the facility accumulate hazardous waste in containers? Yes X No_____ N/A_____ If "No", go to Subpart J.	
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	725.211
(725.211)	Has the generator closed an accumulation area? Yes_____ No_____ N/A X	
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes_____ No_____ N/A X	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes_____ No_____ N/A X	
(725.272)	Is the waste compatible with the container and/or liner? Yes X No_____ N/A_____	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes X No_____ N/A_____	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes X No_____ N/A_____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes X No_____ N/A_____ Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes X No_____ N/A_____	
(725.276)	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes_____ No_____ N/A X **Note:** See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes_____ No_____ N/A X COMMENTS:	
(725.278)	**Section 725.278 Air Emission Standards** Is the owner or operator managiing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes_____ No_____ N/A X Comments:	
	Does the generator accumulate and/or treat hazardous waste in tanks? Yes_____ No X N/A_____ **Note:** If "No", go to Subpart C.	
	SUBPART J: TANK SYSTEMS	
(725.211) (725.214)	Has the generator closed an accumulation area? Yes_____ No_____ N/A_____ If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes_____ No_____ N/A_____	725.211 725.214
(725.290)	Does the facility accumulate or treat hazardous waste in tanks? Yes_____ No_____ N/A_____ **Note:** A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit. If "No", skip Subpart J. a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293. b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a). c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291(a))	For tanks **existing** prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes_____ No_____ N/A_____	
(725.291(b))	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes_____ No_____ N/A_____ 2) hazardous characteristics of the wastes? Yes_____ No_____ N/A_____ 3) existing corrosion protection measures? Yes_____ No_____ N/A_____ 4) documented age of the tank system? Yes_____ No_____ N/A_____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes_____ No_____ N/A_____ *IRPE = Independent Registered Professional Engineer	
(725.291(c))	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes_____ No_____ N/A_____ **Note:** If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292(a))	For **new** tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes_____ No_____ N/A_____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes_____ No_____ N/A_____ 2) hazardous characteristics of the waste(s) to be handled? Yes_____ No_____ N/A_____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes_____ No_____ N/A_____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes_____ No_____ N/A_____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes_____ No_____ N/A_____	
(725.292(g))	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes_____ No_____ N/A_____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	Is secondary containment provided for any new tank system before being put into service? Yes_____ No_____ N/A_____ Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes_____ No_____ N/A_____ For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes_____ No_____ N/A_____ For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes_____ No_____ N/A_____ or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes_____ No_____ N/A_____ For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes_____ No_____ N/A_____	
(725.293(b))	Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes_____ No_____ N/A_____ Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes_____ No_____ N/A_____	
(725.293(c))	To meet the requirements of Subsection (b), is the secondary containment system: 1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes_____ No_____ N/A_____ 2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift? Yes_____ No_____ N/A_____ 3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes_____ No_____ N/A_____ 4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes_____ No_____ N/A_____ and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes_____ No_____ N/A_____ **Note:** A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.	
(725.293(d))	Does the secondary containment for tanks have one or more of the following: 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes_____ No_____ N/A_____	
(725.293(e))	Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes_____ No_____ N/A_____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(f))	Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)? Yes_____ No_____ N/A_____ If "No": 1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes_____ No_____ N/A_____ 2) Are welded flanges, joints and connections inspected daily? Yes_____ No_____ N/A_____ 3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes_____ No_____ N/A_____ 4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily? Yes_____ No_____ N/A_____	
(725.293(i))	Until such time as secondary containment is provided, are the following requirements being met for all tank systems: 1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes_____ No_____ N/A_____ 2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes_____ No_____ N/A_____ 3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes_____ No_____ N/A_____ **Note:** If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.	
(725.294(a))	Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes_____ No_____ N/A_____	
(725.294(b))	Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including: 1) spill prevention controls? Yes_____ No_____ N/A_____ 2) overfill prevention controls? Yes_____ No_____ N/A_____ 3) sufficient freeboard in uncovered tanks? Yes_____ No_____ N/A_____	
(725.294(c))	**Note:** If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.	
(725.295(a))	Does the owner/operator inspect, if present, at least each operating day, the following: 1) overfill/spill control equipment? Yes_____ No_____ N/A_____ 2) the aboveground portion of the tank system for corrosion or releases? Yes_____ No_____ N/A_____ 3) data from monitoring equipment? Yes_____ No_____ N/A_____ 4) the construction materials and the area immediately surrounding the external portion of the system? Yes_____ No_____ N/A_____	
(725.295(b))	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes_____ No_____ N/A_____	
(725.295(c))	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes_____ No_____ N/A_____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator: a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes_____ No_____ N/A_____ b) removed applicable waste from the system within 24 hours of detection? Yes_____ No_____ N/A_____ c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes_____ No_____ N/A_____	
(725.296(d))	d) notified the Agency within 24 hours of detection of release? Yes_____ No_____ N/A_____ d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes_____ No_____ N/A_____ **Note:** Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.	
(725.296(e))	e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes_____ No_____ N/A_____ e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes_____ No_____ N/A_____ e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes_____ No_____ N/A_____ e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes_____ No_____ N/A_____	
(725.296(f))	f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes_____ No_____ N/A_____ **Note:** If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.	
(725.297(a))	At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes_____ No_____ N/A_____	
(725.297(a))	Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes_____ No_____ N/A_____	
(725.297(b))	If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes_____ No_____ N/A_____ **Note:** Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(a))	Are ignitable or reactive wastes placed in a tank system? Yes_____ No_____ N/A_____ If "No", skip to Section 725.299. Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that: - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes_____ No_____ N/A_____ - Section 725.117(b) is complied with? Yes_____ No_____ N/A_____ or Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes_____ No_____ N/A_____ or Is the tank used solely for emergencies? Yes_____ No_____ N/A_____	
(725.298(b))	Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes_____ No_____ N/A_____	
(725.299)	Are incompatible wastes/materials placed in the same tank? Yes_____ No_____ N/A_____ If "No", skip to Section 725.300. Is Section 725.117(b) being complied with? Yes_____ No_____ N/A_____ Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes_____ No_____ N/A_____ COMMENTS:	
(725.302)	**Section 725.302 Air Emission Standards** Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes_____ No_____ N/A_____ Comments:	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PREPAREDNESS AND PREVENTION	
(725.131)	Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes____ No X N/A____ Accumulation under lines & condition of floor	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes X No____ N/A____ b) a telephone or other device to summon emergency assistance from local authorities? Yes X No____ N/A____ c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes X No____ N/A____ d) water at adequate volume and pressure for fire control? Yes X No____ N/A____	X
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes X No____ N/A____	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes X No____ N/A____ b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes____ No____ N/A X	
(725.135)	Is the facility maintaining adequate aisle space? Yes X No____ N/A____	
~~(725.137)~~	~~Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and~~ waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes X No____ N/A____ - agreements designating the primary authority where more than one police or fire department might respond? Yes X No____ N/A____ - agreements with State emergency response teams, contractors and equipment suppliers? Yes X No____ N/A____ - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes X No____ N/A____	
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
(725.151(a))	Is the contingency plan available? Yes X No____ N/A____ If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes X No____ N/A____	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes____ No X N/A____ If "Yes", has the contingency plan been carried out immediately? Yes____ No____ N/A X	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes X No____ N/A____ - explosions? Yes X No____ N/A____ - releases? Yes X No____ N/A____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152(c))	Does the plan describe arrangements with: - police and fire departments? Yes X No____ N/A____ - hospitals? Yes X No____ N/A____ - contractors? Yes X No____ N/A____ - emergency response teams? Yes X No____ N/A____	
(725.152(d))	Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes X No____ N/A____	
(725.152(e))	Does the plan identify all emergency equipment including: - description? Yes X No____ N/A____ - capability? Yes X No____ N/A____ - location? Yes X No____ N/A____ Is the list of emergency equipment up-to-date? Yes X No____ N/A____	
(725.152(f))	Does the plan include: - an evacuation plan? Yes X No____ N/A____ - an evacuation signal? Yes X No____ N/A____ - alternate evacuation routes? Yes X No____ N/A____	
(725.153)	Has the contingency plan (including all revisions) been: a) maintained at the facility? Yes X No____ N/A____ b) submitted to: - police department? Yes X No____ N/A____ - fire department? Yes X No____ N/A____ - hospital? Yes X No____ N/A____ - emergency response teams? Yes X No____ N/A____ Record	
(725.154)	Has the contingency plan been reviewed and revised whenever: a) regulations are revised? 2006, 2009 Yes X No____ N/A____ b) the plan fails in an emergency? Yes____ No____ N/A X c) the facility changes in a way that modifies the emergency response necessary? Yes____ No____ N/A X d) information regarding emergency coordinators changes? Yes X No____ N/A____ e) information regarding equipment changes? Yes X No____ N/A____	
(725.155)	Is the emergency coordinator on-site or on call at all times? Yes X No____ N/A____ Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes X No____ N/A____ Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes X No____ N/A____	
(725.156)	If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes____ No____ N/A X **Note:** If the facility has had a release, explain in detail.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	**Section 725.116 Personnel Training** Does the facility have a training program? Yes X No____ N/A____ Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes X No____ N/A____ Is the program directed by a person trained in hazardous waste management procedures? Yes X No____ N/A____ Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes X No____ N/A____ Does the program cover, at a minimum: - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes X No____ N/A____ - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes X No____ N/A____ - key parameters for automatic waste feed cut-off systems? Yes____ No____ N/A X - communications or alarm systems? Yes X No____ N/A____ - response to fire or explosions? Yes X No____ N/A____ - response to groundwater contamination incidents? Yes X No____ N/A____ - shutdown of operations? Yes X No____ N/A____	
(725.116(b))	Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes X No____ N/A____	
(725.116(c))	Have facility personnel received an annual review of the initial training? Records Yes____ No X N/A____	X
(725.116(d))	Are the following documents and records being maintained at the facility: 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes X No____ N/A____ 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes X No____ N/A____ 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes X No____ N/A____ 4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes X No____ N/A____	
(725.116(e))	Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes____ No X N/A____	X

May have to re-initiate.

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Section 728.107 Waste Analysis and Recordkeeping	
(728.107(a)(5))	Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes_____ No_____ N/A X Is the plan on-site? Yes_____ No_____ N/A X Does the plan include a detailed physical and chemical analysis? Yes_____ No_____ N/A X Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes_____ No_____ N/A X Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes_____ No_____ N/A X	
	Section 722.134 Satellite Accumulation	
722.134(c)	Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes_____ No_____ N/A X Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes_____ No_____ N/A X If there are more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes_____ No_____ N/A X During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes_____ No_____ N/A X	
722.134(g)	**Note:** A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.	
	SUBPART D: RECORDKEEPING AND REPORTING	
	Section 722.140 Recordkeeping	
722.140(a)	Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes X No_____ N/A_____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes X No_____ N/A_____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes X No_____ N/A_____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes_____ No_____ N/A X	722.140(d)
	Section 722.141 Annual Reporting	
722.141(a)	Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes X No_____ N/A_____ **Note:** If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	722.141(a)

No on-site treatment

Have on-site at time of the inspection.

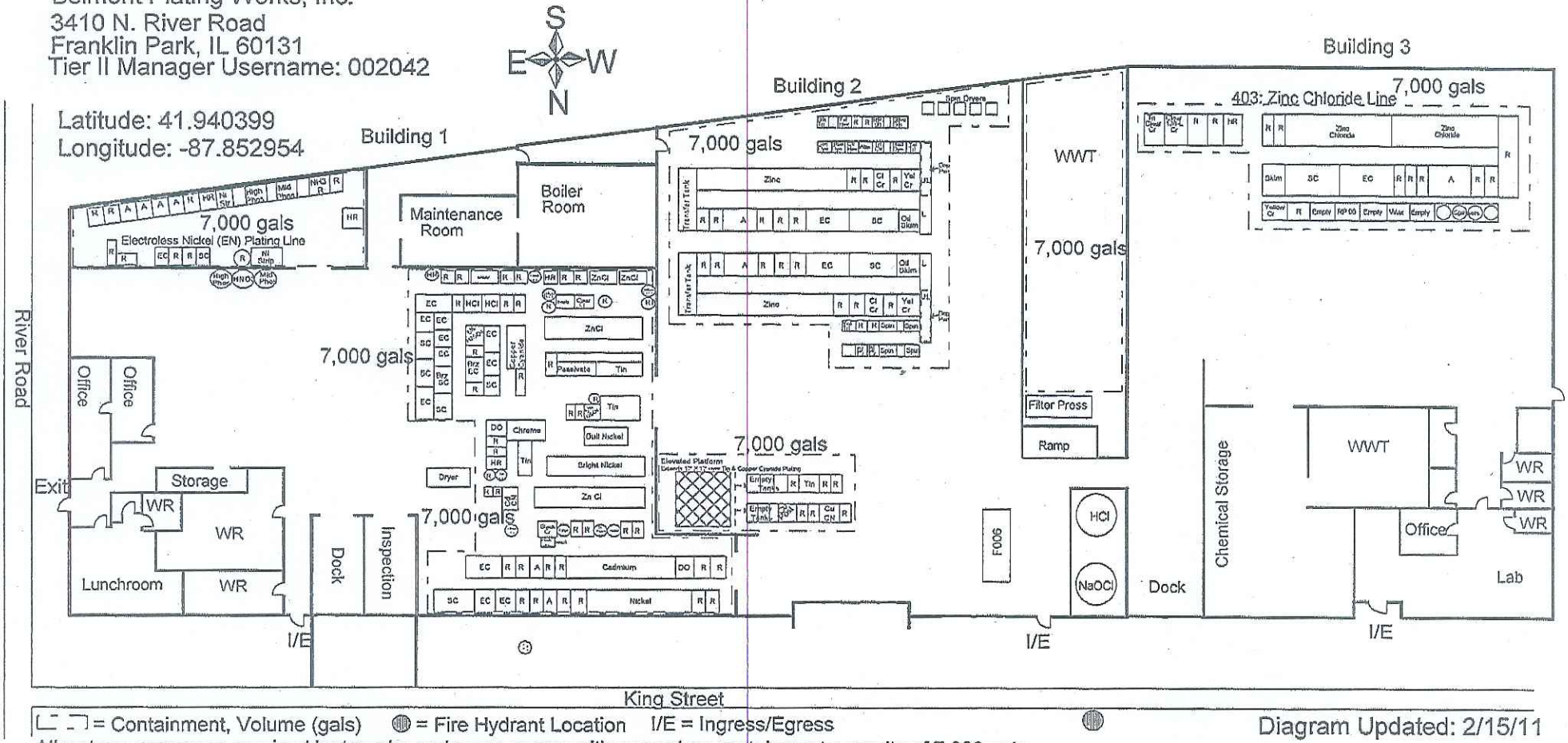
Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes X No_____ N/A_____	722.141(b)
722.142(a)(1)	**Section 722.142 Exception Reporting** If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes_____ No_____ N/A X	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes_____ No_____ N/A X	722.142(a)(2)
722.143	**Section 722.143 Additional Reporting** Has the generator furnished additional reports as required by the Director? Yes_____ No_____ N/A X	722.143
	SUBPART E: EXPORTS OF HAZARDOUS WASTE	
722.150	Is the generator an exporter of hazardous waste? Yes_____ No X N/A_____ If "Yes", has the generator complied with the requirements of Subpart E? Yes_____ No_____ N/A X	722.150
	SUBPART F: IMPORTS OF HAZARDOUS WASTE	
722.160	Is the generator an importer of hazardous waste? Yes_____ No X N/A_____ If "Yes", has the generator complied with the requirements of Subpart F? Yes_____ No_____ N/A X	722.160
	SUBPART G: FARMERS	
722.170	Is the generator a farmer? Yes_____ No X N/A_____ If "Yes", has the generator complied with the requirements of Subpart G? Yes_____ No_____ N/A X	722.170
	COMMENTS:	

TM:jab\722LQG.doc

ATTACHMENT B
Post Inspection Documents

Belmont Plating Works, Inc.
3410 N. River Road
Franklin Park, IL 60131
Tier II Manager Username: 002042

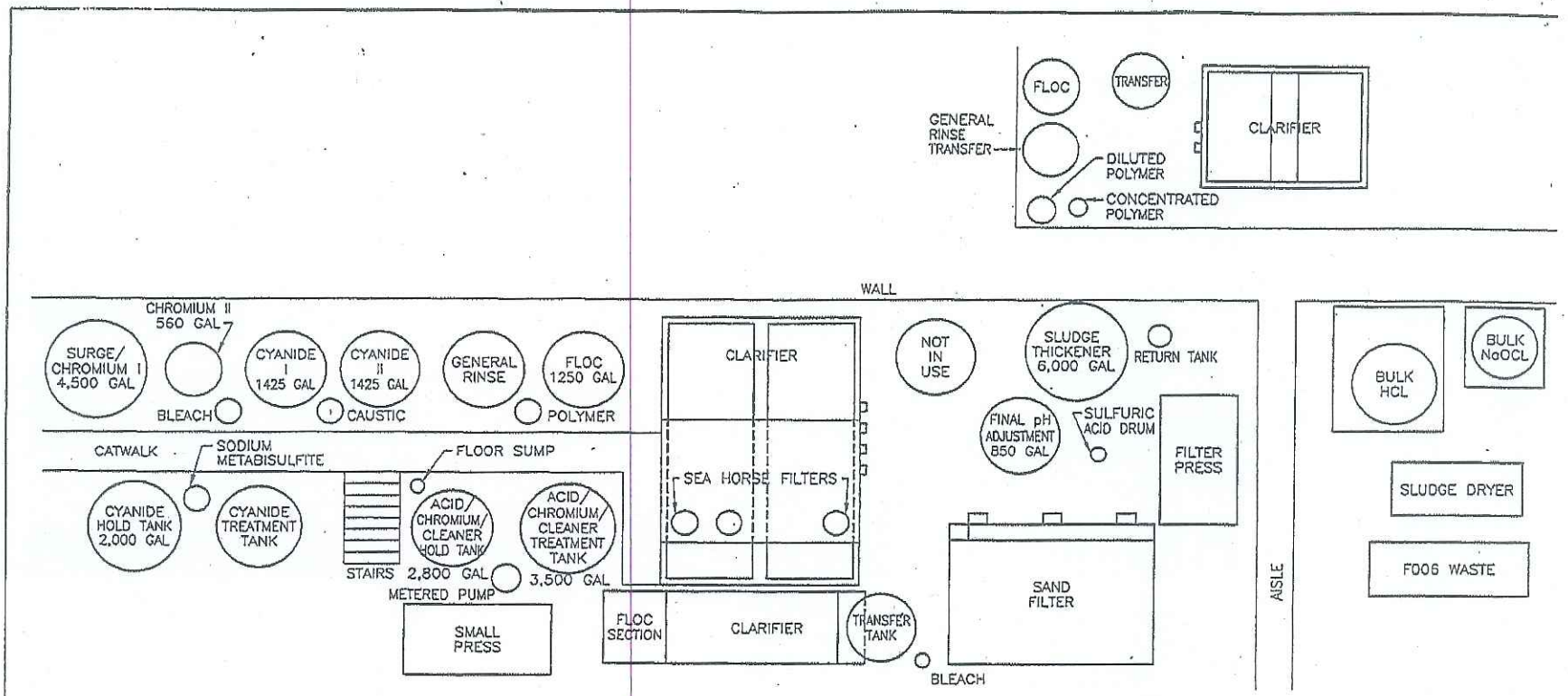
Latitude: 41.940399
Longitude: -87.852954



= Containment, Volume (gals) = Fire Hydrant Location I/E = Ingress/Egress

Diagram Updated: 2/15/11

All wet processes are serviced by troughs and sump pumps with secondary containment capacity of 7,000 gals.



ON-SITE WASTEWATER TREATMEI
SITE PLAN
BELMONT PLATING WORKS
3410 N. RIVER ROAD

10/22

SCALE: NOT TO SCALE

LAND\01\41122\DWG\41122PLAN3

FEHR-GRAHAM & ASSOCIATES
ENGINEERING AND SCIENCE CONSULTANTS
660 W. STEPHENSON ST. FREEPORT, IL 61032-5098 815/235-7643
1920 DAIMLER RD. ROCKFORD, IL 61112-1008 815/394-4700
410 MAIN STREI SAVANNA, IL. 6 815/273-7400

************PLEASE SIGN-IN************

**********REGISTRE POR FAVOR**********

Employer Name: Belmont Plating Works

Location: 3410 N. River Road, Franklin Park, IL 60131

Instructor: Joanne Kiepura	**Date of Training:** October 26, 2010	**Subject:** Annual RCRA Refresher, including facility's emergency response procedures & annual assignment of individual's responsibilities

Please sign-in that you have attended this class. ***Registre por favor si usted ha asistido este entrenamiento.***

EMPLOYEE NAME (Please Print) ***NOMBRE del EMPLEADO*** ***(Por favor Impresión)***	**EMPLOYEE # or DEPARTMENT**	**EMPLOYEE SIGNATURE FIRMA DEL EMPLEADO**
Olga Vivero		Olga Vivero.
Luis Perez	Pollution	Luis Perez
Javier de Jesus		Javier de Jesus
Robert W. Bethel		Robert W. Bethel

Annual RCRA Refresher Training Certification

EPA/RCRA requirements for Large Quantity Generators training as per 40 CFR 265.56 & 35 IAC 725.156. Within 180 days of employment, if directly supervised, with annual refresher training:

Employees who work with hazardous waste must be trained in hazardous waste management procedures relevant to their position. Such training will ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, equipment and systems including, where applicable.

- Procedures for using, inspecting, repairing/replacing facility emergency & monitoring equipment
- Proper response to fires, explosions & releases
- Operation of communications and/or alarm system(s)
- Shutdown of operations
- Company's specific emergency response procedures (Review of CSCP)
- Annual assignment of individual's responsibilities (hazardous waste handler, emergency coordinators & emergency response personnel)

I, Robert W. Bethel, certify that upon this date the company for whom I am employed, Belmont Plating Works, Inc. has trained me on the above items. I understand my responsibilities and will follow our company's procedures for the safe handling of hazardous waste and facility-specific emergency response procedures.

Robert W. Bethel — 10/26/11

Signature — Date of Training

Joanne Klepura — Joanne Klepura

Instructor's Name — Signature

Scientific Control Laboratories, Inc., 3158 S. Kolin Avenue, Chicago, IL 60623

Instructor's Address

ASSIGNED RESPONSIBILITIES

Bob Bethel — Name of Employee (Print)

Plant Manager — Position Title

Required Skill/Qualifications: Has sufficient training and/or expertise to demonstrate competency as a First Responder at the Awareness Level as defined by 20 CFR 1910.120(q)(6)(i).

Training Requirements: Employees are required to have initial training and annual refresher training. See Chemical Safety Contingency Plan, training materials and/or training records for specifics.

Position responsibilities and duties regarding hazardous waste activity.

CHECK APPLICABLE STATEMENTS

___Emergency Coordinator for all hazardous waste activities.

✓ Alternate Emergency Coordinator for all hazardous waste activities.

✓ Responsible for air, water, &/or solid waste control systems on the site.

___Obtains all required permits, licenses or modifications of same from local, state, and federal regulatory bodies.

___Resolves problems involving permits and licenses from local, state, and federal regulatory agencies.

✓ Notifies proper authorities in emergency situations.

✓ Regularly inspects plant grounds and buildings for status of air, water, solid &/or hazardous waste emissions & controls.

___Responsible for the drafting and submission of all required reports to EPA or the state.

✓ Assumes the duties of the plant owner/president regarding hazardous waste activities in his absence.

✓ Directs the waste operators in the performance of their duties.

___Operates and/or maintains the waste handling equipment.

___Reviews all generated wastes and assigns wastes to proper storage location.

___Inspects storage tanks as required for proper operation and structural integrity.

___Inspects drum storage area for evidence of leaks, spills, incompatible materials, & inappropriately placed or labeled drums.

___Inspects emergency equipment on a regular basis.

✓ Assists in training of new operators and mechanics to handle hazardous waste spills and leaks safely and in such a way as to avoid exposures.

___Makes appropriate entries into operating log, monitoring records, inspection records, &/or maintenance records, and files them according to established system.

✓ Notifies plant authorities as necessary in emergency situations.

✓ Takes emergency action on <u>own</u> authority in accordance with established procedures.

___ Other (Please specify)_____

___ Other (Please specify)_____

___ Other (Please specify)_____

I certify that on this date my responsibilities to my company's Chemical Safety Contingency Plan have been reviewed with me.

Robert W. Bethel — Employee (Signature)

10/26/10 — Date

Joanne Espinosa — Reviewer (Signature)

Annual RCRA Refresher Training Certification

EPA/RCRA requirements for Large Quantity Generators training as per 40 CFR 265.56 & 35 IAC 725.156. Within 180 days of employment, if directly supervised, with annual refresher training:

Employees who work with hazardous waste must be trained in hazardous waste management procedures relevant to their position. Such training will ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, equipment and systems including, where applicable.

- Procedures for using, inspecting, repairing/replacing facility emergency & monitoring equipment
- Proper response to fires, explosions & releases
- Operation of communications and/or alarm system(s)
- Shutdown of operations
- Company's specific emergency response procedures (Review of CSCP)
- Annual assignment of individual's responsibilities (hazardous waste handler, emergency coordinators & emergency response personnel)

I, Javier De Jesus, certify that upon this date the company for whom I am employed, Belmont Plating Works, Inc. has trained me on the above items. I understand my responsibilities and will follow our company's procedures for the safe handling of hazardous waste and facility-specific emergency response procedures.

Javier de Jesus — 10-26-10
Signature — Date of Training

Joanne Kiepura — Joanne Kiepura
Instructor's Name — Signature

Scientific Control Laboratories, Inc.; 3158 S. Kolin Avenue, Chicago, IL 60623
Instructor's Address

ASSIGNED RESPONSIBILITIES

Javier De Jesus
Name of Employee (Print)

Wastewater Treatment Operator
Position Title

Required Skill/Qualifications: Has sufficient training and/or expertise to demonstrate competency as a First Responder at the Awareness Level as defined by 20 CFR 1910.120(q)(6)(i).

Training Requirements: Employees are required to have initial training and annual refresher training. See Chemical Safety Contingency Plan, training materials and/or training records for specifics.

Position responsibilities and duties regarding hazardous waste activity.

CHECK APPLICABLE STATEMENTS

- √ Responsible for air, water, &/or solid waste control systems on the site.
- √ Notifies proper authorities in emergency situations.
- √ Regularly inspects plant grounds and buildings for status of air, water, solid &/or hazardous waste emissions & controls.
- ___ Assumes the duties of the plant owner/president regarding hazardous waste activities in his absence.
- √ Directs the waste operators in the performance of their duties.
- √ Operates and/or maintains the waste handling equipment.
- √ Reviews all generated wastes and assigns wastes to proper storage location(s).
- ___ Inspects waste storage tanks, if applicable, as required for proper operation and structural integrity.
- √ Inspects drum storage area for evidence of leaks, spills, incompatible materials, & inappropriately placed or labeled drums.
- ___ Inspects emergency equipment on a regular basis.
- √ Assists in training of new operators and mechanics to handle hazardous waste spills and leaks safely and in such a way as to avoid exposures.
- ___ Makes appropriate entries into operating log, monitoring records, inspection records, &/or maintenance records, and files them according to established system.
- √ Notifies plant authorities as necessary in emergency situations.
- ___ Takes emergency action on <u>own</u> authority in accordance with established procedures.
- ___ Other (Please specify)_____
- ___ Other (Please specify)_____
- ___ Other (Please specify)_____

I certify that on this date my responsibilities to my company's Chemical Safety Contingency Plan have been reviewed with me.

Employee (Signature) Javier De Jesus Date 10-26-10 Reviewer (Signature)

Annual RCRA Refresher Training Certification

EPA/RCRA requirements for Large Quantity Generators training as per 40 CFR 265.56 & 35 IAC 725.156. Within 180 days of employment, if directly supervised, with annual refresher training:

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- Proper response to fires, explosions & releases
- Operation of communications and/or alarm system(s)
- Shutdown of operations
- Company's specific emergency response procedures (Review of CSCP)
- Annual assignment of individual's responsibilities (hazardous waste handler, emergency coordinators & emergency response personnel)

I, Luis Perez, certify that upon this date the company for whom I am employed, Belmont Plating Works, Inc. has trained me on the above items. I understand my responsibilities and will follow our company's procedures for the safe handling of hazardous waste and facility-specific emergency response procedures.

Luis Perez — 10-26-10

Signature — Date of Training

Joanne Kiepura — Joanne Kiepura

Instructor's Name — Signature

Scientific Control Laboratories, Inc., 3158 S. Kolin Avenue, Chicago, IL 60623

Instructor's Address

ASSIGNED RESPONSIBILITIES

Luis Perez
Name of Employee (Print)

Wastewater Treatment Operator
Position Title

Required Skill/Qualifications: Has sufficient training and/or expertise to demonstrate competency as a First Responder at the Awareness Level as defined by 20 CFR 1910.120(q)(6)(i).

Training Requirements: Employees are required to have initial training and annual refresher training. See Chemical Safety Contingency Plan, training materials and/or training records for specifics.

Position responsibilities and duties regarding hazardous waste activity.

CHECK APPLICABLE STATEMENTS

✓ Responsible for air, water, &/or solid waste control systems on the site.

✓ Notifies proper authorities in emergency situations.

✓ Regularly inspects plant grounds and buildings for status of air, water, solid &/or hazardous waste emissions & controls.

✓ Assumes the duties of the plant owner/president regarding hazardous waste activities in his absence.

✓ Directs the waste operators in the performance of their duties.

✓ Operates and/or maintains the waste handling equipment.

✓ Reviews all generated wastes and assigns wastes to proper storage location(s).

___ Inspects waste storage tanks, if applicable, as required for proper operation and structural integrity.

✓ Inspects drum storage area for evidence of leaks, spills, incompatible materials, & inappropriately placed or labeled drums.

✓ Inspects emergency equipment on a regular basis.

✓ Assists in training of new operators and mechanics to handle hazardous waste spills and leaks safely and in such a way as to avoid exposures.

___ Makes appropriate entries into operating log, monitoring records, inspection records, &/or maintenance records, and files them according to established system.

✓ Notifies plant authorities as necessary in emergency situations.

___ Takes emergency action on <u>own</u> authority in accordance with established procedures.

___ Other (Please specify)____________________

___ Other (Please specify)____________________

___ Other (Please specify)____________________

I certify that on this date my responsibilities to my company's Chemical Safety Contingency Plan have been reviewed with me.

Luis Perez — Employee (Signature)

10-26-10 — Date

[signature] — Reviewer (Signature)

Annual RCRA Refresher Training Certification

EPA/RCRA requirements for Large Quantity Generators training as per 40 CFR 265.56 & 35 IAC 725.156. Within 180 days of employment, if directly supervised, with annual refresher training:

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- Procedures for using, inspecting, repairing/replacing facility emergency & monitoring equipment
- Proper response to fires, explosions & releases
- Operation of communications and/or alarm system(s)
- Shutdown of operations
- Company's specific emergency response procedures (Review of CSCP)
- Annual assignment of individual's responsibilities (hazardous waste handler, emergency coordinators & emergency response personnel)

I, Olga Vivero., certify that upon this date the company for whom I am employed, Belmont Plating Works, Inc. has trained me on the above items. I understand my responsibilities and will follow our company's procedures for the safe handling of hazardous waste and facility-specific emergency response procedures.

Olga Vivero. 10-26-10

Signature Date of Training

Joanne Kiepura Joanne Kiepura

Instructor's Name Signature

Scientific Control Laboratories, Inc., 3158 S. Kolin Avenue, Chicago, IL 60623

Instructor's Address

ASSIGNED RESPONSIBILITIES

Olga Vivero — Name of Employee (Print)

Quality — Position Title

Required Skill/Qualifications: Has sufficient training and/or expertise to demonstrate competency as a First Responder at the Awareness Level as defined by 20 CFR 1910.120(q)(6)(i).

Training Requirements: Employees are required to have initial training and annual refresher training. See Chemical Safety Contingency Plan, training materials and/or training records for specifics.

Position responsibilities and duties regarding hazardous waste activity.

CHECK APPLICABLE STATEMENTS

___Responsible for air, water, &/or solid waste control systems on the site.

___Notifies proper authorities in emergency situations.

___Regularly inspects plant grounds and buildings for status of air, water, solid &/or hazardous waste emissions & controls.

___Assumes the duties of the plant owner/president regarding hazardous waste activities in his absence.

___Directs the waste operators in the performance of their duties.

___Operates and/or maintains the waste handling equipment.

___Reviews all generated wastes and assigns wastes to proper storage location(s).

___Inspects waste storage tanks, if applicable, as required for proper operation and structural integrity.

___Inspects drum storage area for evidence of leaks, spills, incompatible materials, & inappropriately placed or labeled drums.

___Inspects emergency equipment on a regular basis.

___Assists in training of new operators and mechanics to handle hazardous waste spills and leaks safely and in such a way as to avoid exposures.

___Makes appropriate entries into operating log, monitoring records, inspection records, &/or maintenance records, and files them according to established system.

_\/_Notifies plant authorities as necessary in emergency situations.

___Takes emergency action on <u>own</u> authority in accordance with established procedures.

___ Other (Please specify)_____

___ Other (Please specify)_____

___ Other (Please specify)_____

I certify that on this date my responsibilities to my company's Chemical Safety Contingency Plan have been reviewed with me.

Olga Vivero — 10-26-10 — Employee (Signature) — Date

Reviewer (Signature)

ASSIGNED RESPONSIBILITIES

Dave Toni
Name of Employee (Print)

Vice-President
Position Title

Required Skill/Qualifications: Has sufficient training and/or expertise to demonstrate competency as a First Responder at the Awareness Level as defined by 20 CFR 1910.120(q)(6)(i).

Training Requirements: Employees are required to have initial training and annual refresher training. See Chemical Safety Contingency Plan, training materials and/or training records for specifics.

Position responsibilities and duties regarding hazardous waste activity.

CHECK APPLICABLE STATEMENTS

✓ Emergency Coordinator for all hazardous waste activities.

___Alternate Emergency Coordinator for all hazardous waste activities.

___Responsible for air, water, &/or solid waste control systems on the site.

___Obtains all required permits, licenses or modifications of same from local, state, and federal regulatory bodies.

___Resolves problems involving permits and licenses from local, state, and federal regulatory agencies.

✓ Notifies proper authorities in emergency situations.

___Regularly inspects plant grounds and buildings for status of air, water, solid &/or hazardous waste emissions & controls.

___Responsible for the drafting and submission of all required reports to EPA or the state.

✓ Assumes the duties of the plant owner/president regarding hazardous waste activities in his absence.

___Directs the waste operators in the performance of their duties.

___Operates and/or maintains the waste handling equipment.

___Reviews all generated wastes and assigns wastes to proper storage location.

___Inspects storage tanks as required for proper operation and structural integrity.

___Inspects drum storage area for evidence of leaks, spills, incompatible materials, & inappropriately placed or labeled drums.

___Inspects emergency equipment on a regular basis.

___Assists in training of new operators and mechanics to handle hazardous waste spills and leaks safely and in such a way as to avoid exposures.

___Makes appropriate entries into operating log, monitoring records, inspection records, &/or maintenance records, and files them according to established system.

✓ Notifies plant authorities as necessary in emergency situations.

✓ Takes emergency action on <u>own</u> authority in accordance with established procedures.

___ Other (Please specify)__________

___ Other (Please specify)__________

___ Other (Please specify)__________

I certify that on this date my responsibilities to my company's Chemical Safety Contingency Plan have been reviewed with me.

Employee (Signature)	10/26/10 Date	[signature] Reviewer (Signature)

ASSIGNED RESPONSIBILITIES

Mark Toni — Name of Employee (Print)

President — Position Title

Required Skill/Qualifications: Has sufficient training and/or expertise to demonstrate competency as a First Responder at the Awareness Level as defined by 20 CFR 1910.120(q)(6)(i).

Training Requirements: Employees are required to have initial training and annual refresher training. See Chemical Safety Contingency Plan, training materials and/or training records for specifics.

Position responsibilities and duties regarding hazardous waste activity.

CHECK APPLICABLE STATEMENTS

- [x] Emergency Coordinator for all hazardous waste activities.
- [ ] Alternate Emergency Coordinator for all hazardous waste activities.
- [ ] Responsible for air, water, &/or solid waste control systems on the site.
- [x] Obtains all required permits, licenses or modifications of same from local, state, and federal regulatory bodies.
- [x] Resolves problems involving permits and licenses from local, state, and federal regulatory agencies.
- [x] Notifies proper authorities in emergency situations.
- [ ] Regularly inspects plant grounds and buildings for status of air, water, solid &/or hazardous waste emissions & controls.
- [x] Responsible for the drafting and submission of all required reports to EPA or the state.
- [ ] Assumes the duties of the plant owner/president regarding hazardous waste activities in his absence.
- [ ] Directs the waste operators in the performance of their duties.
- [ ] Operates and/or maintains the waste handling equipment.
- [ ] Reviews all generated wastes and assigns wastes to proper storage location.
- [ ] Inspects storage tanks as required for proper operation and structural integrity.
- [ ] Inspects drum storage area for evidence of leaks, spills, incompatible materials, & inappropriately placed or labeled drums.
- [ ] Inspects emergency equipment on a regular basis.
- [ ] Assists in training of new operators and mechanics to handle hazardous waste spills and leaks safely and in such a way as to avoid exposures.
- [ ] Makes appropriate entries into operating log, monitoring records, inspection records, &/or maintenance records, and files them according to established system.
- [x] Notifies plant authorities as necessary in emergency situations.
- [x] Takes emergency action on <u>own</u> authority in accordance with established procedures.
- [ ] Other (Please specify)_____
- [ ] Other (Please specify)_____
- [ ] Other (Please specify)_____

I certify that on this date my responsibilities to my company's Chemical Safety Contingency Plan have been reviewed with me.

Employee (Signature)	Date	Reviewer (Signature)
	10/26/10	Jeanne Kiefner

************PLEASE SIGN-IN*************

**********REGISTRE POR FAVOR**********

Employer Name: Belmont Plating Works

Location: 3410 N. River Road, Franklin Park, IL 60131

Instructor: Joanne Kiepura	**Date of Training:** October 20, 2011	**Subject:** Annual RCRA Refresher, including facility's emergency response procedures & annual assignment of individual's responsibilities

Please sign-in that you have attended this class. ***Regístre por favor si usted ha asístido este entrenamiento.***

EMPLOYEE NAME (Please Print) ***NOMBRE del EMPLEADO (Por favor Impresión)***	**EMPLOYEE # or DEPARTMENT**	**EMPLOYEE SIGNATURE FIRMA DEL EMPLEADO**
Pedro Zarco		Mónica Cuenca
Maria de Jesús		Leonardo Tellez
Elvira Carreño		Socorro Ocampo
Pedro Mojica		Miguel A. Bautista
Daniel Leno		José Luis Basilio
Vicente Ambriz		Miguel Ovalle.
[illegible]		Alfonso Cabrera.
Anai Delgado		Willy Molina
[illegible] Morill		Macario Gijon.
Jesús Bahena		Miguel Quijas
Salvador Aguirre		Adriana Aguilar
[illegible]		Camilo [illegible]
Beatriz Gonzalez		Victor [illegible]
Nelson Sotelo		
Santos [illegible]		
Hugo S. Hernandez		
Graciela Velazquez		
Manuel Olivas		
Isai Ordaz		
Elison Leon		
Esther Gonzales		
[illegible]		
Efren Gaimez		
Hector Garcia		
Jose Ysabel Reyna		
Angel Feliz		
Juan Armando Aragon	Polucion	
Wenceslao Gonzalez	Barrel Lin	

U. S. Environmental Protection Agency
Region 5, Land and Chemicals Division
RCRA Branch
77 West Jackson Boulevard
Chicago, Illinois 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT ADDENDUM

SITE NAME:	Belmont Plating Works Incorporated
EPA ID NUMBER:	ILD005114665
ADDRESS:	3410 North River Road Franklin Park, Illinois 60131
DATE OF INSPECTION:	July 22 and 23, 2014
EPA INSPECTOR:	Daniel F. Chachakis Environmental Protection Specialist (EPS)

PREPARED BY: Daniel F. Chachakis, EPS — Date: 09/18/2014
Compliance Section 1

ACCEPTED BY: Michael Cunningham, Chief — Date: 9/18/14
Compliance Section 1

Note: This report is an addendum to the Belmont Plating Works Incorporated Inspection Report, dated June 9, 2014.

Purpose of Inspection: This inspection was a continuation of Belmont Plating Works, multimedia inspection. The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI) conducted as part of a multimedia CEI. The RCRA portion of the multimedia inspection occurred on April 29, 2014. *See* Belmont Plating Works Incorporated Inspection Report, dated June 9, 2014.

Participants

- *Inspector(s):*
  John Gierczak, EPA, Multimedia Team Lead
  Daniel F. Chachakis, EPA, RCRA Inspector
  Multimedia Team members

- *Site Representative(s):*
  Dave Toni, Vice President, Belmont Plating, Incorporated
  Persons responsible for hazardous waste management

Introduction: The inspectors arrived at the site at approximately 8:30 am on July 23, 2014. We introduced ourselves, presented our inspector credentials and business cards, and described the purpose and process by which we intended to conduct the inspection. Mr. Toni provided us with a description of the site operations, led the tour, and provided us with the records we requested for review.

The EPA Multimedia Team Leader informed Mr. Toni that the facility could claim any information gathered during the inspection as confidential business information (CBI), including: verbal information, documents and photographs. Mr. Toni claimed all information gathered and pictures taken during the inspection as CBI.

Site Description: *See* Belmont Plating Works Incorporated Inspection Report, dated June 9, 2014.

Belmont Plating Inc. was founded in 1947 as a job shop. The facility plates thousands of different parts using different specifications for the automotive, appliance and defense industries. The facility has approximately 70 employees, and operates under SIC code: 3471 (Electroplating, Plating, Polishing, Anodizing, and Coloring).

The facility uses zinc, cadmium, tin, copper, nickel, and trivalent chromium. Mr. Toni stated that the facility does not generate enough waste chromium to report under the CWA. There are lead anodes in the chrome tank – lead is the best transfer agent for chrome. No silver, gold, or other precious metals. The facility executes barrel and rack plating, with the majority being barrel zinc plating. He stated that demand for hex chrome plating is "way down;" mostly for use on military products.

Mr. Toni stated there are no floor drains in the facility. He stated that the wastewater treatment system runs continuously, 24/7, and has generator power available. He stated that facility can

conduct on-site waste analysis. He stated that wastewaters are collected in sumps and pumped to the wastewater treatment system, then to the sewer.

Site Tour, Day 1: *See* Belmont Plating Works Incorporated Inspection Report, dated June 9, 2014.

We walked through facility operations, focusing on air and water components of the multimedia inspection. The facility was not operating as they were in a major maintenance phase for the summer months. Mr. Toni did not allow the inspectors into parts of the facility, including the wastewater treatment system, due to "safety concerns."

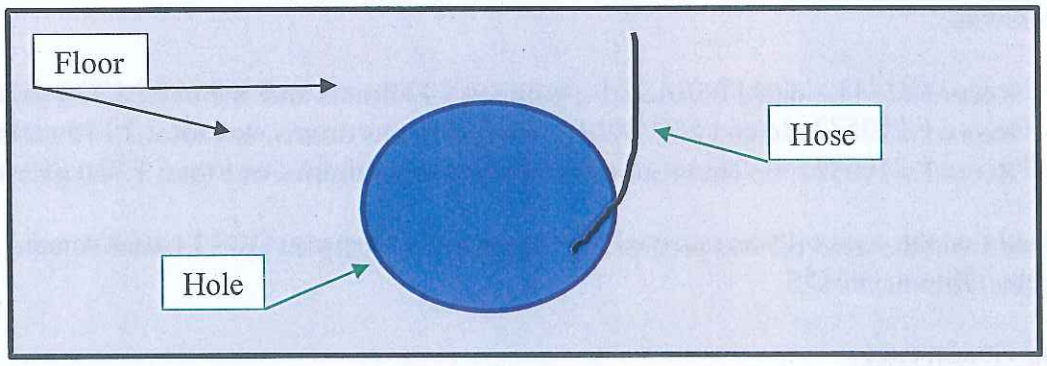
Lab: The facility conducts thickness testing with x-ray machines, as well as batch testing, calibration, wastewater testing, and solution analysis.

Salt Spray Chamber: The facility uses an approximately 5% salt solution to check corrosion protection.

Building 3, Zinc Plating Line: I observed the presence of yellow material in the secondary containment for the line. Mr. Toni stated the material was wax.

Chemical Storage Area:

- I observed the presence of twelve 55-gallon containers of used oil, all labeled with the words, and "used oil."
- We observed the presence of a "hole" in the concrete floor in front of a sign with the words, "TBT 2N 200 MT Brightener Containers." I drew a diagram:



Mr. Toni determined that this was a dry sump receiving condensate water from a compressor.

Building 2: I observed that the hazardous waste roll-off container had a cover and a hazardous waste label, and that the label was marked with the accumulation start date of, "7-15-14," the hazardous waste characteristic code of, "F006," and the words, "Plating Sludge."
Mr. Toni stated that two lines in this area were down for maintenance.

Wastewater Treatment System Area: I observed the presence of hazardous waste labels on containers with wheels. Mr. Toni stated that workers use the containers to move the waste to the roll-off container. I observed that the containers were not in use at the time of the inspection.

Building 1: Mr. Toni stated that this was the original building, and in operation since approximately 1952.

We returned to the conference room / lab area.

Records Review, Day 1: Mr. Toni provided a description of the wastewaters:

- Non-cyanide, non-chrome wastewater that is pH adjusted for metal precipitation.
- Wastewater containing cyanide and metals, treated with alkaline chlorination to destroy cyanide.
- Wastewater containing hexavalent chromium, treated with sodium metabisulfate to reduce hexavalent chromium.

We departed at approximately 3:00 pm.

Site tour, Day 2: We arrived at approximately 8:30 am. We focused the continued site tour on water and wastewater activities. The water inspector looked at storm water drains and their respective outflows, and the wastewater treatment system including the movement of wastewater in the facility.

Mr. Toni stated that rainwater from one loading dock can be diverted to the wastewater treatment system.

Records Review, Day 2: I reviewed used oil records, executed a used oil checklist, and recorded the following:

- Record #21443, dated 05/01/2014; pump out 40 drums and one tank; 2,400 gallons.
- Record # 207572, dated 05/23/2014; miscellaneous drums, one tote; 2,100 gallons.
- Record # 210587, no date recorded; miscellaneous drums, one tote; 1,700 gallons.

I recorded that the used oil was received by: Beaver Oil Company, 6037 Lenzi Avenue, Hodgkins, Illinois, 60525.

Closing Conference

We again summarized the issues identified in the Belmont Plating Works Incorporated Inspection Report, dated June 9, 2014. The other multimedia inspectors discussed their issues for the two day period.

The inspection concluded at approximately 3:00 pm.

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Mr. Dave Toni
Owner & Vice President
Belmont Plating Works, Inc.
3410 North River Road
Franklin Park, Illinois 60131

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mr. Dave Toni
Owner & Vice President
Belmont Plating Works, Inc.
3410 North River Road
Franklin Park, Illinois 60131

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)* Roy Newman — B. Date of Delivery 12-15-14

C. Signature
X [signature] ☐ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

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